

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	06/04/2025		
Media Program:	Water		
Regulatory Program(s)	CWA		
Company Name:	Universal City, City of		
Facility Name:	Wastewater Utility Department		
Facility Physical Location:	Public Works Building		
(city, state, zip code)	Universal City, TX 78148		
Mailing address:	2150 Universal City Blvd.		
(city, state, zip code)	Universal City, TX 78148		
County:	Bexar county		
Facility Phone Number	210-658-5364		
Facility Contact:	Randy Luensmann	Public Works Director	
	pwdirector@uctx.gov		
FRS Number:	110010934800		
Identification/Permit Number:	TXU000194		
NAICS:	221320		
SIC:	4952		
Personnel participating in inspection:			
Name	Affiliation	Title	Email
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Damon McElroy	EPA Region 6	Enforcement Officer	mcelroy.damon@epa.gov
EPA Inspector Signature/Date			
	{Inspector name}		Date
Supervisor Signature/Date			
	{Supervisor name}		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Damon McElroy arrived at the Universal City Public Works Building at 9:00 am on June 4, 2025, for an announced inspection. I (Damon McElroy) met with the city officials and San Antonio River Authority representative specified above and listed in the Appendix 2 Sign-in Sheet. I presented my federal credential identification to the participants. I informed the group this was an EPA inspection to determine compliance with the Clean Water Act regarding sanitary sewer overflows (SSO) from the wastewater collection system. The scope of the inspection is a compliance evaluation to determine if the city's sanitary sewer collection system capacity, management, operations, and maintenance (CMOM) is sufficient to prevent SSOs.

FACILITY DESCRIPTION

Universal City serves about 21,000 citizens over a 5.6 sq. mile area through 5,908 residential service connections, 564 commercial connections, and two septic systems. The 85 miles of gravity collection system is comprised of several types of pipe material as estimated in the below table:

Pipe Material	Approx. Quantity (Feet)	Approx. Quantity (%)
PVC	69,564	15.5%
VC	246,840	55.0%
HDPE	3,142	0.7%
A/C	449	0.1%
Unknown	128,806	28.7%

The Universal City Utility Operations Division is responsible for the construction, maintenance, and capital improvement of the city's wastewater infrastructure. This division cleans and maintains the city's wastewater mains and two lift stations (LS). It also responds to clogged sanitary sewer lines, emergency overflows and LS repairs. The collection system directs about half of its sanitary sewer flow under contract for treatment to the Cibolo Creek Municipal Authority (CCMA) Regional WWTP (Permit: TX0077232), with the other half similarly being transmitted to San Antonio River Authority's (SARA) Salatrillo WWTP (Permit: TX0053074).

Section II – OBSERVATIONS

- The city maintains 12 working sewer "Hot Spot" areas as shown on a wastewater (WW) site map in "red" marker (reference Appendix 1, Photo 1) where maintenance activities are completed about two or three times through the year as needed to prevent blockages and SSOs as follows:

- Gravity main is jet-cleaned.
 - Condition of MH (manhole) ring and lid is established.
 - Condition of inside MH benching is documented (bench refers to the sloped concrete infill placed between the walls of a manhole and the sewer pipes, creating a channel for wastewater flow. It serves to direct flow back into the channel, preventing backups and providing a platform for maintenance workers).
 - A working log sheet is maintained of the results, located at the public works building.
- The city provides adequate training including through a WW operator certification program.
 - The city implements an adequate work order management system for utility assets that includes wastewater O&M management, invoice management, SSO recovery and response, and general utility reporting and tracking.
 - The primary cause of SSOs is described as FOG (fats, oils, and grease) blockage followed by construction accidents.
 - A FOG program is implemented including restaurant inspections and enforcement through the city Code Enforcement Group as codified in city ordinance.
 - Universal City has authority through city code to ensure that customers maintain working service laterals.
 - The city reports sufficient hydraulic capacity for current conditions and future growth to prevent SSOs. Projected capacity at CCMA and SARA WWTPs is also accounted for as adequate to prevent any hydraulic issues, both current and future.
 - Wastewater collection system O&M activities are required to be supervised and inspected daily by an on-site licensed wastewater operator. The minimum Universal City supervisory operator licence requirement is collection system Class III since the daily average flow is over 1 MGD; reference 30 TAC, Chapter 30, Subchapter J [Section 30.350 (n)]. City Official Mr. Joe Gonzales is a Class III operator that meets the minimum TCEQ wastewater operator level for supervision.
 - The city responds to emergency calls via a call center during working hours (Monday through Friday 8 am to 5 pm) and via police dispatch on weekends and after normal business hours. City wastewater officials are available 24 hours a day to respond to emergency utility events.

Inflow and Infiltration Reduction Plans: I&I is storm water runoff and ground water that enters the collection system through pipe and MH defects and can lead to high flows and SSOs. It is in the best interests of Universal City as well as CCMA and SARA to reduce I&I through ongoing collection system remediation and repair.

1. SARA provided Universal City with a final I&I Reduction Plan Report, dated June 5, 2024, that provides a phased sanitary sewer inspection analysis, condition assessment, and remedial measures plans to reduce I&I in the sewer shed that the SARA WWTP serves. SARA analysed its CCTV NASSCO (industry standard pipe and MH rating system) and hydraulic analysis data to prioritize anticipated pipe and MH remediation and repair in three priority tiers over three phases.

2. CCMA similarly tasked HDR engineering services to provide the draft “Phase 2” I&I Study, dated July 27, 2023, of the CCMA sewer shed. HDR will review CCTV Data and NASSCO ratings of pipe and MHs as well as hydraulic flow monitoring data to prioritize collection system (pipe and MHs) remediation and repairs to reduce I&I, as well as provide associated prioritized remedial measures plans.

Lift station maintenance: The city’s two LSs, indicated in Table A below, are inspected and maintained every day as documented in LS inspection logs. The LSs are monitored by SCADA (supervisory control and data acquisition system) for power, communications, pump failures, and wet-well level. The two LSs have backup power generators, security fencing and signage (see Photos 4 and 6 in Appendix #1). The backup generators are maintained by contract annually. The inside of the LSs, or the wet well area, appeared clean and well maintained (see Photos 5 and 7 in Appendix #1). Although always monitored for emergency response by SCADA, I observed the LSs to have no working on-site audiovisual alarms. The LS inspection logs, and Standard Operational Procedures (SOPs) are kept in the main office.

Table A: Robinson Lift Station Summary Table:

ID	LS Name	Observations	Appendix 1 Photo Nos.
1	Cibolo Crossing	SCADA monitoring telemetry, security cameras, back-up generator, on-site visual alarm, no observed quick connect.	4 & 5
2	Silver Terrace	SCADA monitoring telemetry, on-site visual alarm, back-up generator.	6 & 7

SSO reporting analysis: TCEQ has a record of Universal City reported SSOs associated with SARA and CCMA WWTP permit numbers indicated in Table B below. The two 2024 dated SSO reports, requested for a three-year period (i.e. 6/4/22 to 6/4/25), were provided by the city to the EPA inspector during the inspection:

Table B: Universal City Reported SSOs

SSO Gallons	SSO Date	Source	Cause	Address
75	4/30/2024	No Water Body Provided	Blockage	101 Deer Glen Ave.
20,000	9/6/2024	Spilled into Street	Blockage	Behind 910 Kitty Hawk Rd. sewer backup on outfall line under Loop 1604.
1,000	6/26/2023	Spilled onto Ground	Blocked sewer line	Olympia hills golf course - Universal City. [Jet and vac to clear the line. Area cleaned/disinfected.]
20,000	2/26/2021	No Water Body Provided	Blockage	942 Kitty Hawk Rd., Under Hwy 1604.

Based on a SSO workorder analysis compared to the reported SSOs, I observed customer complaints that indicated that city reported all known or reported SSOs. However, the SSO dated 6/26/2023 in Table B above may not have been adequately filed or reported by the city.

Section III – AREAS OF CONCERN

1. Confirm the city files, reports and is aware of all relevant SSOs (reference 6/26/2023 SSO documented in Table B above that was observed as not disclosed by city during inspection).

Section III – RECOMMENDATIONS

1. Identify what material the unknown pipe is comprised.
2. Continue Universal City support to achieve timely construction of the CCMA and SARA Remedial Measures Plans to reduce I&I and stop SSOs.
3. Maintain SOPS of all processes, examples including CMOM, SSO recovery and response, and LS O&M.

Section IV – FOLLOW UP

No additional information was requested or received by EPA after exiting the Facility on 6/4/2025.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 7 photos taken 6/4/2025.

Appendix 2 – Opening conference sign-in sheet.

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Universal City Public Works and Collection System		
City: Universal City	County: Bexar	State: Texas

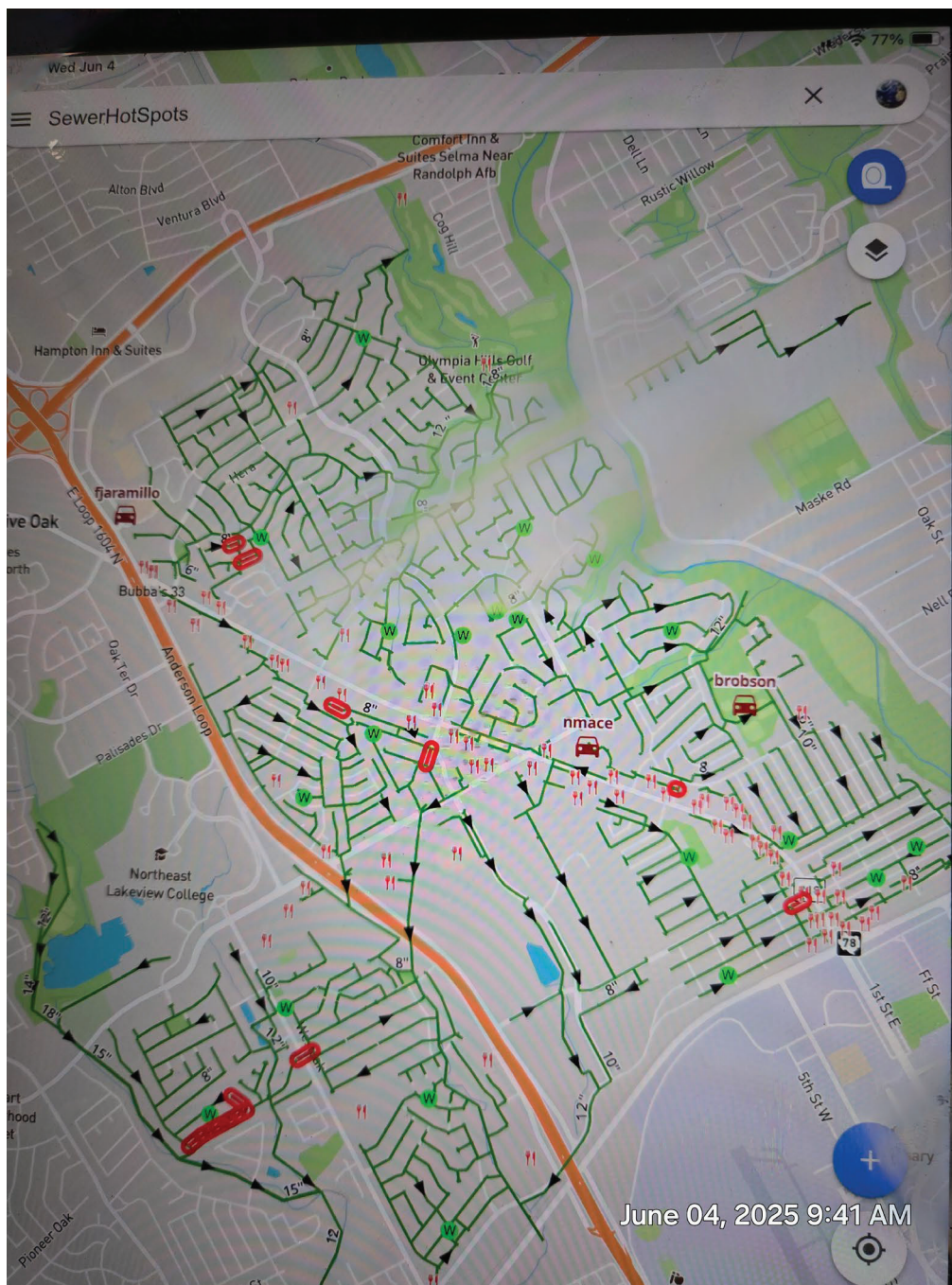


Photo File Name: 20250604_094105.jpg

Photographer: DLM

Description: Sanitary Sewer Site Map showing Hot Spot areas in "red" marker where city jet-truck cleans gravity mains regularly (two or more times throughout the year) to prevent SSOs.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Universal City Public Works and Collection System		
City: Universal City	County: Bexar	State: Texas

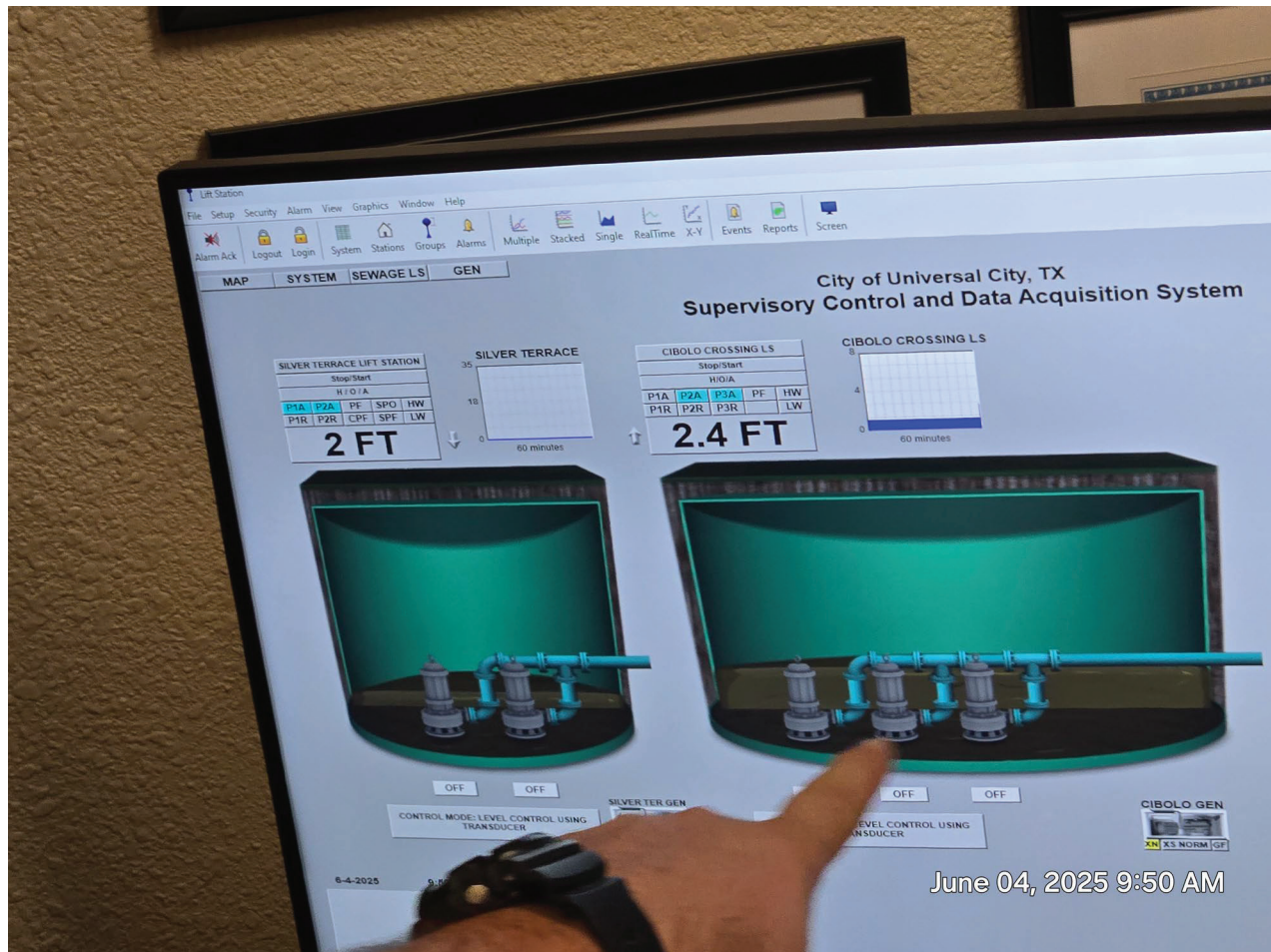


Photo File Name: 20250604_095007.jpg

Photographer: DLM

Description: Supervisory Control and Data Acquisition System (SCADA) installed on Universal City work-computer showing monitoring and control of both the city's lift stations.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Universal City Public Works and Collection System		
City: Universal City	County: Bexar	State: Texas



Photo File Name: 20250604_095456.jpg

Photographer: DLM

Description: City Jet-Truck.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 4

Location: Universal City Public Works and Collection System		
City: Universal City	County: Bexar	State: Texas



Photo File Name: 20250604_100456.jpg

Photographer: DLM

Description: Cibolo Crossing LS, Outside View.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Universal City Public Works and Collection System		
City: Universal City	County: Bexar	State: Texas



Photo File Name: 20250604_100744.jpg

Photographer: DLM

Description: Cibolo Crossing LS inside wet well, clean and in good visible condition.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Universal City Public Works and Collection System		
City: Universal City	County: Bexar	State: Texas



Photo File Name: 20250604_102154.jpg

Photographer: DLM

Description: Silver Terrace LS outside view.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Universal City Public Works and Collection System		
City: Universal City	County: Bexar	State: Texas



Photo File Name: 20250604_102252.jpg

Photographer: DLM

Description: Silver Terrace LS inside wet well, clean and in good visible condition.

Appendix 2

Sign-in Sheet

CITY: UNIVERSAL CITY

[illegible]